

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

NOTICE OF MOTION FOR A HEARING, SUPPRESSION, AND OTHER RELIEF

PLEASE TAKE NOTICE THAT, upon the Declaration of Teny Geragos, Esq., dated December 4, 2024, the exhibit attached thereto, and the accompanying Memorandum of Law, defendant Sean Combs, by and through his undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, N.Y., 10007 at a date and time to be determined by the Court, for an Order (1) for discovery and a hearing; (2) suppressing Mr. Combs' privileged notes and any fruits of the illegal search; (3) directing that a Special Master conduct privilege review in lieu of the Filter Team going forward; (4) considering whether any or all of the prosecutors must be disqualified because they were tainted by access to the privileged materials; (5) ordering the government to stop monitoring Mr. Combs' communications with the defense team; and (6) subject to the evidence adduced at the hearing, dismissing the indictment.

Date: December 4, 2024

Respectfully Submitted,

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